



U.S. Department of Housing and Urban Development

**Philadelphia Office
The Wanamaker Building
100 Penn Square East
Philadelphia, Pennsylvania 19107-3380**

NOV 14 2014

The Honorable Perry Heath
President of Council
Borough of Carlisle
Municipal Building
53 West South Street
Carlisle, PA 17013

Dear Mr. Heath:

**SUBJECT: Annual Community Assessment
Borough of Carlisle
July 1, 2013 to June 30, 2014**

The provisions of the Housing and Community Development Act of 1974, as amended, and the National Affordable Housing Act of 1990, require the annual submission of performance reports by grant recipients receiving federal assistance through programs covered under these Acts. Additionally, these Acts require that a determination be made by the Secretary of HUD that the grant recipient is in compliance with the statutes and has the continuing capacity to implement and administer the programs for which assistance is received.

The Consolidated Plan regulations at 24 CFR 91.525 require this Department to evaluate and report to the public on a community's overall progress in the management of its program funds, compliance with the Consolidated Plan, the accuracy of performance reports, and the extent to which progress has been achieved toward the statutory goals identified in Section 91.1. This letter serves to apprise you of our assessment of the Borough of Carlisle's overall progress.

In making our evaluation, we relied primarily upon the Borough's submission of the Consolidated Annual Performance and Evaluation Report (CAPER) for Fiscal Year 2013. This report summarized accomplishments made with funds provided from the Community Development Block Grant (CDBG) Program. In addition, we took into account technical assistance, follow up conversations with the Borough's staff, and the handling of citizen comments and complaints. This letter is a summary of our review of Carlisle's overall performance.

As you know, under the update to the Part 91 Consolidated Planning regulations that came into effect March 13, 2006, all Annual Action Plans and Consolidated Annual Performance and Evaluation Reports (CAPER) are required to include performance measures as part of their annual reporting. The Office of Management and Budget (OMB) has deemed this information necessary to validate the continued funding of HUD programs. The Borough provided performance measures as required by this guidance.

The HUD timeliness requirement is that a community may have no more than 1.5 times their most recent annual grant remaining in the line of credit 60 days prior to the end of their program year. When the 60-day timeliness test was conducted on May 2, 2014, it was calculated that the Borough of Carlisle had a balance in its line of credit equal to 1.42 times its annual grant. Please note that this did not include any program income that the Borough may have in its accounts. The Borough, therefore, appears to be in compliance with Section 570.902 of the CDBG regulations.

During the 2013 Program Year, the Borough has expended 72.8 percent of its CDBG funds for activities benefiting low/moderate income persons, which meets the primary objective of the Housing and Community Development Act of 1974. In addition, the Borough obligated 10.7 percent of funds on public service activities, which is within the 15 percent regulatory cap. The Borough obligated 11.4 percent of its funds on planning and administration, less than the 20 percent regulatory cap.

The Borough included in its CAPER their role in affirmatively furthering fair housing and identifying impediments to fair housing. The Borough's agent, the Cumberland County Redevelopment Authority, participates in the local Fair Housing Council. A fair housing Analysis of Impediments covering all of Cumberland County (including Carlisle) was prepared and published in April 2004 and is currently being updated. Completion is expected by the end of calendar year 2014. Annually the Authority identifies potential development projects that will de-concentrate housing for protected classes. In 2013, the Redevelopment Authority followed up on the recommendations contained in the Analysis, and took the following actions: placed a notice on the Authority's web page, produced a new pamphlet on fair housing for distribution, and reminded the County Planning Commission about the need to review municipal codes for impediments to fair housing. The Authority receives periodic inquiries regarding fair housing. Anecdotally, the information in the pamphlet is frequently cited as the catalyst for the inquiry. Please note that the Office of Fair Housing and Equal Opportunity (FHEO) is available to provide technical assistance regarding affirmatively furthering fair housing upon your request.

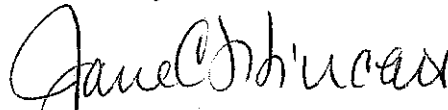
The Borough cooperates with Polyclinic Hospital in its lead based paint poisoning intervention program. In the Carlisle area, doctors report cases involving high lead blood levels to Polyclinic Hospital in Harrisburg. The Hospital then notifies Carlisle. The Carlisle code enforcement department enforces the property maintenance code at the address where the child lives. This code requires either the removal of lead surfaces, or scraping and covering the surface. A non-profit, Carlisle Housing Opportunities Corporation (CHOC) includes lead abatement as part of the rehabilitation of units it acquires under the Borough's Homebuyer Program and its Lease-to-Purchase Homeownership Program, for which CHOC is the developer. The Borough utilized grant funds received by the County from the Pennsylvania Department of Health for the reduction of lead-based paint hazards. The funds were used to abate hazards in properties in the Borough's First Time Homebuyer Program in the Carlisle Pride areas, which is sponsored by the non-profit Carlisle Housing Opportunities Corporation. While these funds are no longer available, Carlisle Housing Opportunities Corporation now utilizes CDBG funds from the Borough and borrowed funds to pay for abatement of lead paint hazards in these homes. Educational information is provided to homeowners so that they understand the hazards of lead based paint poisoning and the possible need to test children under seven.

We congratulate the Borough on its many accomplishments during this program year. Based on our review we have concluded that the Borough of Carlisle has the capacity to carry out its programs and has met its reporting requirements

We ask that you review our assessment of your performance and provide any comments that you may have within 35 days of the date of this letter. Upon receipt, we will evaluate your comments and make any revisions that are deemed appropriate. If you do not have any comments, we request that you formally notify us of that fact within the 35-day timeframe. Where no comments are received within the designated timeframe, our initial letter will serve as our final assessment of the Borough's performance for this program year. To facilitate and expedite citizen access to our performance letter, we request that you inform the general public and interested citizens' organizations and non-profit entities of its availability. If, for any reason, the Borough chooses not to do so, please be advised that our office is obligated to make the letter available to the public. We appreciate your cooperation in this matter.

We look forward to continuing to work with you and members of your staff to accomplish Departmental goals and mutual objectives to develop viable urban communities. We would also be pleased to provide you with any information on resources that may be available to your community. If you need assistance, or if you have any questions concerning the content of this letter, please contact Mr. Nadab O. Bynum, Community Planning and Development Director, at (215) 861-7652, or Ms. Michelle Patterson, Senior Community Planning Development Representative, at (215) 861-7665. This office may be reached via text telephone (TTY), by dialing (215) 656-3452.

Sincerely,



Jane C. W. Vincent
Regional Administrator

cc:

✓ Mr. Ben Laudermilch